

4. Describe all other waste codes and treatment processes:

<u>Waste Code</u>	<u>Treatment Processes</u>
D003/D005/D008	THERMAL TREATMENT
_____	_____
_____	_____

5. Characteristic wastes:

Is the 40 CFR Part 268 treatment standard lower than the 40 CFR Part 261 characteristic level?*

Yes ___ No ☒

*This applies to both concentration based treatment standards specified in 40 CFR 268.41 and 268.43, and to some 40 CFR 268.42 required methods which result in treatment below the characteristic level. See Appendix D.

If yes, does the facility manage the waste as restricted until 40 CFR Part 268 treatment standards are met, even after the waste is rendered non-hazardous? [40 CFR 268.9(d)]

Yes ___ No ___

Comments _____

6. Dilution Prohibition [40 CFR 268.3]:

- a. Does the facility mix prohibited wastes with different treatment standards?

Yes ___ No ☒ (If No, go to c.)

List the wastes _____

- b. Are the wastes amenable to the same type of treatment? [55 FR 22666]

Yes ☒ No ___

If yes, is this method used for the aggregated wastes?

Yes ☒ No ___

Comments _____

- c. Based on an assessment of points a. and b., or any other relevant information, is dilution used as a substitute for treatment? [40 CFR 268.3(a)]

Yes ___ No ☒

Comments _____

7. Does the facility, in accordance with an acceptable waste analysis plan, test residues from all treatment processes? [40 CFR 268.7(b)]

Yes ☒ No ☐

Comments _____

8. Does the facility ship any characteristic wastes which have been rendered non-hazardous to a Subtitle D facility?

Yes ☐ No ☒ (If No, go to 9.)

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Are a notification and a certification for each shipment sent to the Regional Administrator or authorized State? [40 CFR 268.9(d)(1) and 268.7(b)(5)]

Yes ☐ No ☐

9. Does the facility ship any wastes or treatment residues to an off-site land disposal facility?

Yes ☒ No ☐ (If No, go to 10.)

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>
D003/D005/D008	ENVIROSAFE
_____	_____
_____	_____

Are a notification and a certification provided to the land disposal facility with each waste shipment? [40 CFR 268.7(b)(4) and 40 CFR 268.7(b)(5)]

Yes ☒ No ☐

10. Does the facility ship any wastes or treatment residues to be further managed at a different treatment or storage facility?

Yes ☒ No ☐ (If No, go to E.)

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>
D003/D005/D008	ENVIROSAFE
_____	_____
_____	_____

Are appropriate generator notifications and certifications provided to the receiving facility with each waste shipment? [40 CFR 268.7(b)(6)]

Yes ☒ No ☐

E. Surface Impoundments [40 CFR 268.4]

1. Are restricted wastes placed in surface impoundments for treatment?

Yes ☐ No ☒ (If No, go to F.)

List _____

2. Are evaporation or dilution the only recognizable treatment occurring in the surface impoundment? [40 CFR 268.3(a) and 268.4(b)]

Yes ☐ No ☐

Comments _____

3. Has the facility submitted to the Agency a waste analysis plan and certification of compliance with minimum technology requirements and ground-water monitoring requirements? [40 CFR 268.4(a)(4)]

Yes ☐ No ☐

4. If the minimum technology requirements have not been met, has a waiver been granted for that unit? [40 CFR 268.4(a)(3)(ii)]

Yes ☐ No ☐ NA ☐

5. Are representative samples of sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analyses specified in the waste analysis plan? (Attach test results.) [40 CFR 268.4(a)(2)(i)]

Yes ☐ No ☐

6. Does the operating record adequately document the results of waste analyses performed in accordance with 40 CFR 268.4? [40 CFR 264.73(b)(3) and 265.73(b)(3)]

Yes ☐ No ☐

Comments _____

7. Do the treatment residues (sludges or liquids) exceed applicable treatment standards/prohibition levels?

Sludge Yes ☐ No ☐ Waste Code _____
 Supernatant Yes ☐ No ☐ Waste Code _____

Provide the frequency of analyses conducted on treatment residues:

8. If sludge residues exceed treatment standards/prohibition levels, are they removed on an annual basis? [40 CFR 268.4(a)(2)(ii)]

Yes ☐ No ☐ NA ☐

Comments _____

Are residues subsequently managed in another surface impoundment? [40 CFR 268.4(a)(2)(iii)]

Yes ☐ No ☐

9. If supernatant is determined to exceed treatment standards, is annual throughput greater than impoundment volume? [40 CFR 268.4(a)(2)(ii)]

Yes ☐ No ☐ NA ☐

Comments _____

F. Land Disposal

1. Are restricted wastes placed in or on the land in units such as landfills, surface impoundments*, waste piles, land treatment units, salt domes/beds, mines/caves, concrete vaults, or bunkers? [40 CFR 268.2(c)]

Yes ☒ No ☐ (If No, go to G.)

*Note: Do not include surface impoundments addressed in E.

If yes, specify which units and what wastes each unit has received:

<u>Unit</u>	<u>Waste</u>
<u>WASTEPILE</u>	<u>D003/D005/D008</u>
_____	_____
_____	_____

2. Does the facility, in accordance with an acceptable waste analysis plan, test prohibited wastes prior to land disposal to ensure that all applicable treatment standards and/or prohibition levels have been met? [40 CFR 268.7(c)(2)]

Yes ☒ No ☐

Comments _____

LAND DISPOSAL RESTRICTIONS INSPECTION

V. TRANSPORTER REQUIREMENTS

N/A

RMI-METALS IS TRANSPORTER
OF OFF-SITE WASTES.

- A. Does the transporter accumulate restricted wastes for more than 10 days? [40 CFR 268.50(a)(3)]

Yes ☐ No ☐

If yes, check the appropriate regulatory status:

☐ Interim status for storage
☐ RCRA permit for storage

(The TSD checklist must also be completed.)

If no, describe inventory controls to ensure that wastes are not stored for more than 10 days:

- B. Does the transporter mix or combine restricted wastes of different DOT shipping descriptions? [40 CFR 263.10(c)(2)]?

Yes ☐ No ☐

(If yes, the Generator checklist must also be completed.)

- C. Are restricted wastes treated in RCRA exempt units (boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)?

Yes ☐ No ☐ (If No, do not complete this section.)

List types of waste treatment units and processes:

Waste Code	Type of Treatment	Treatment Units or Process
_____	_____	_____
_____	_____	_____
_____	_____	_____

Are treatment residuals generated from these units?

Yes ☐ No ☐

Comments _____

Are residuals further treated, stored for greater than 10 days, or disposed on site?

Yes ☐ No ☐ NA ☐

(If Yes, the TSD checklist must also be completed.)

December 11, 1987 @ 0930

Date and Time of Inspection

RCRA INTERIM STATUS INSPECTION FORM

IHWAB # 02-04-0584

U.S. EPA I.D. # OHD 000 810 242

GENERAL INFORMATION

Facility: RMI - Sodium Plant Address: State Road & East 6th Street City: Ashtabula
State: Ohio Zip Code: 44004 County: Ashtabula Telephone: 216-997-5141

INSPECTION PARTICIPANT(S)

	(Name)	(Title)	(Telephone)
1.	<u>James Steudler</u>	<u>Senior Engineer, Environmental Control</u>	<u>216-544-7802</u>
2.	<u>Ben DiRienzo</u>	<u>Plant Manager</u>	<u>216-997-5141</u>
3.	<u>Brian Wright</u>	<u>Production Manager</u>	<u>216-997-5141</u>

INSPECTOR(S)

1.	<u>Donald F. Easterling</u>	<u>Environmental Scientist</u>	<u>216-425-9171</u>
2.			
3.			

INSTALLATION ACTIVITY

Mark One

If the site is a TSDF, check the boxes indicating which areas were reviewed.

☐ Generator only (G)

☐ Transporter (T)

☐ TSDF only

☐ G-T

☒ G-TSDF

☐ T-TSDF

☐ G-T-TSDF

☒ General Facility Standards, Preparedness and Prevention, Contingency and Emergency Manifests/Records/Reporting, Closure

☐ Containers S01

☐ Tanks S02/T01

☐ Surface Impoundments S04/T02

☒ Incineration/Thermal Treatment

☒ Waste Piles S03

☐ Land Treatment D01

☐ Landfills D00

☐ Chemical/Physical/Biological 104

☐ Groundwater Monitoring

☐ Post-Closure

RCRA INTERIM STATUS INSPECTION FORM

1. Has the facility submitted a Part A to OHIO?

2. If "yes", is it complete and accurate?

3. Has the facility submitted a Part B?

4. Was advance notice of the inspection given? If so, how far in advance?

IF THE SITE HAS RECEIVED A PART B PERMIT, USE THE RCRA STATUS INSPECTION FORM.

[illegible]

Include a brief description of site activity and waste handling.

Facility: RMI - Sodium plant manufactures elemental sodium and chlorine by electrolysis of salt (NaCl) in Downs Cells. See attached flow diagram.

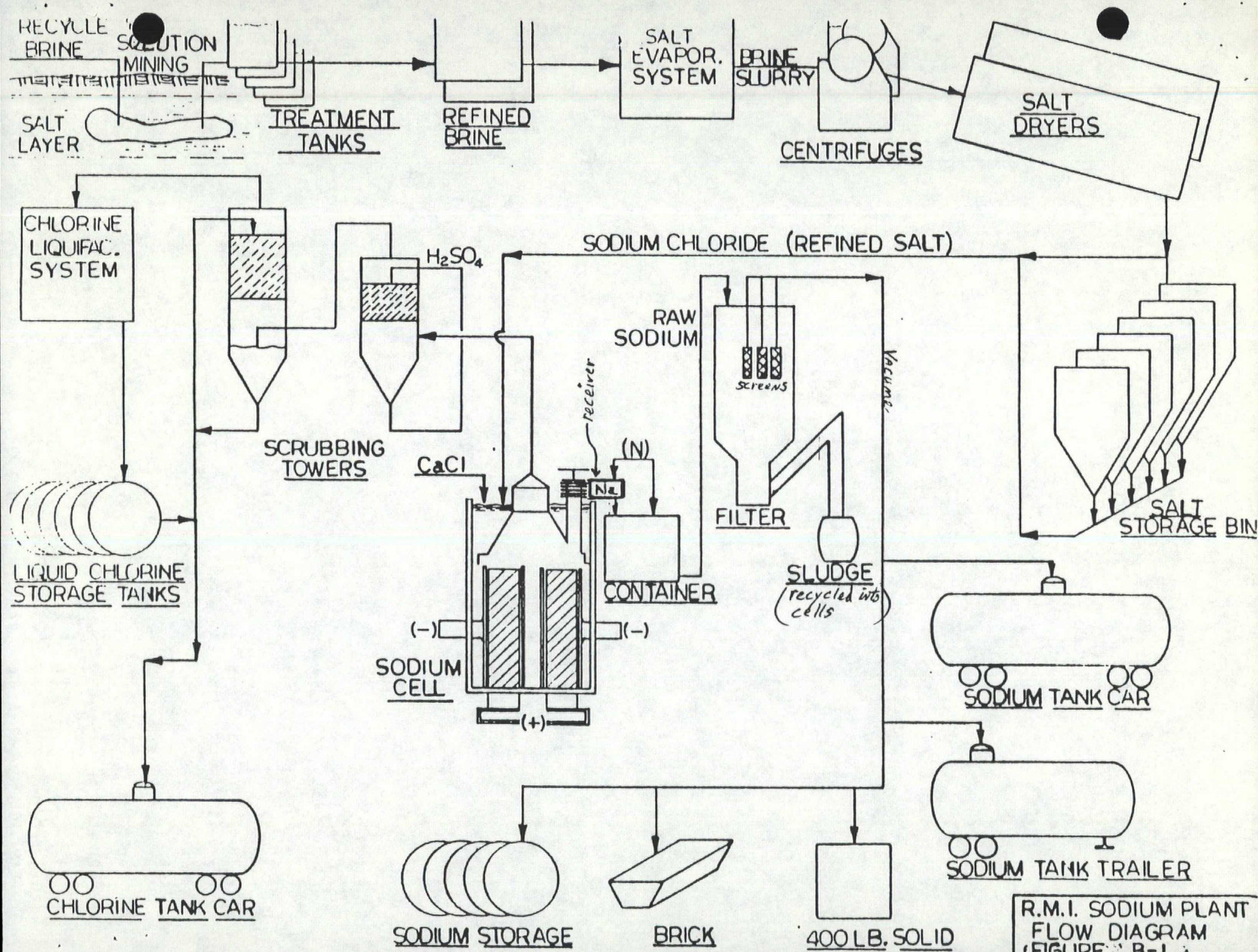
Hazardous Wastes :

A. Cell bath wastes: Sport salt wastes are generated from occasional overflows

These wastes are stored in a sheltered waste pile prior to off-site disposal.

B. Sodium/Calcium Sludge : A mixture of elemental sodium and calcium (and oxides) builds up on

The walls of receivers, containers, pipes, and valves. This material is hazardous due to reactivity. It is removed by burning in the burn room. The residues are not reactive.



RCRA INTERIM STATUS INSPECTION FORM

40 CFR 262 (OAC 3745-52) GENERATOR REQUIREMENTS

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Section 261 and in compliance with the requirements of Sections 262.11. [3745-52-11(D)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Does this facility generate any hazardous wastes that are excluded from regulation under Section 261.4 [3745-51-04] (statutory exclusions) or Section 261.6 [3745-51-06(A)(1)] (recycle/reuse)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	#1
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Section 265.1(c)(9)) [3745-65-01] or via operation of an elementary neutralization unit and/or wastewater treatment unit (Section 265.1(c)(10) [3745-65-01]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	#2
4. The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				
a) The manifest form used contains all of the information required by Section 262.21(a) and (b) [3745-52-21] and the minimum number of copies required by Section 262.22 [3745-52-22].	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Section 262.20 [3745-52-20(B)(C)(D)].	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) Prepared manifests have been signed by the generator and initial transporter in compliance with Section 262.23 [3745-52-23(A)(1 and 2)].	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Section 262.42(a)(b) [3745-52-42].	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Section 262.40 [3745-52-40]. (262.40(a)) [3745-52-40(a)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

RCRA INTERIM STATUS INSPECTION FORM

	Yes	No	N/A	Remark #
5. The generator meets the following hazardous waste pre-transport requirements:				
a) Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked in accord with applicable DOT regulations (Section 262.30, 262.31 and 262.32(a)) [3745-52-30, 3745-52-31, 3745-52-32]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 liters) or less is affixed with a completed hazardous waste label as required by Section 262.32(b) [3745-52-32].	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
c) The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Section 262.33 [3745-52-33].	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	EP toxic only
6. Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Section 262.50 [3745-52-50]	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
7. If the generator elects to store hazardous waste on-site in containers or tanks for 90 days or less without a RCRA storage permit as provided under Section 262.34 [3745-52-34], the following requirements with respect to such storage are met:				
a) The containers are clearly marked with the words "Hazardous Waste".	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
b) The date that accumulation began is clearly marked on each container.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
8. The generator has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) [3745-65-16(A)(B)(C)] including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course. (Section 262.34) [3745-52-34(A)(4)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
9. The generator keeps all of the records required by Section 265.16(d)(e) [3745-65-16(D)(E)] including written job titles, job descriptions and documented employee training records (Section 262.34) [3745-52-34(A)(4)].	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

RCRA INTERIM STATUS INSPECTION FORM

NOTE: SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265 [3745-65], SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND CERTAIN PORTIONS OF THE "CONTAINERS" AND "TANKS" RULES BE MET. COMPLETE THE APPROPRIATE SECTIONS OF THE INSPECTION FORM.

REMARKS, GENERATOR REQUIREMENTS

- #1. Sludge from the sodium filters, containing elemental sodium and calcium, is collected in barrels and recycled as an ingredient in the electrolytic cells (without prior reclamation).
- #2. Sulfuric acid which is not recycled is treated on-site by elementary neutralization. The resulting wastewater is discharged to treatment ponds and regulated via an NPDES permit.

RCRA INTERIM STATUS INSPECTION FORM

40 CFR 265 (OAC 3745-65-et seq.) GENERAL INTERIM STATUS REQUIREMENTS AND TSD REQUIREMENTS

Yes No N/A Remark #

Subpart B: General Facility Standards

1. The operator has a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by Section 264.13(a) [3745-65-13(A)(1)]

☒ ☐ ☐ ☐

2. The operator has a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste.
(Section 264.13(b)) [3745-65-13(B)]

☒ ☐ ☐ ☐

3. a) Would physical contact with the waste structures or equipment injure unknowing/unauthorized persons or livestock entering the facility?
(264.14(a)(1)) [3745-65-14(A)(1)]

☒ ☐ ☐ ☐

b) Would disturbance of the waste cause a violation of the hazardous waste regulations? (264.14(a)(2)) [3745-65-14(A)(2)]

☒ ☐ ☐ ☐

IF BOTH 3a AND 3b ARE "NO", MARK QUESTIONS 4 AND 5 "NOT APPLICABLE".

4. The facility has -

a) A 24-hour surveillance system, or

☒ ☐ ☐ ☐

b) An artificial or natural barrier and a means to control entry at all times (264.14(b)(2)). [3745-65-14(B)(2)(a and b)]

☒ ☐ ☐ ☐

5. The facility has a sign "Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations as necessary. (264-14(c)) [3745-65-14(C)]

☒ ☐ ☐ ☐

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
6. a) The operator has developed and followed a comprehensive, written inspection plan and documented the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. (264.15) [3745-65-15]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) Areas subject to spills (i.e., loading and unloading areas, container storage areas, etc.) are inspected daily when in use and according to other applicable regulations when not actively in use. (264.15(b)(4)) [3745-65-15(B)(4)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7. The facility has provided a Personnel Training Program in compliance with Section 264.16(a)(b)(c) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course. [3745-64-16(A)(B)(C)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8. The facility keeps all records required by Section 265.16(d)(e) including written job titles, job descriptions and documented employee training records. [3745-64-16(D)(E)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
9. If required due to the actual hazards associated with Ignitable, Reactive or incompatible waste materials, the facility meets the following requirements: (Section 264.17) [3745-65-17]				
a) Protection from sources of ignition.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) Physical separation of incompatible waste materials.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d) Any comingling of waste materials is done in a controlled, safe manner as prescribed by Section 264.17(b). [3745-65-17(B)]	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

Subpart C: Preparedness and Prevention

1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (264.31) [3745-65-31] _ ☒ _ _
2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (264.32) [3745-65-32(A)(B)(C)(D)]
 - a) Internal alarm system. _ ☒ _ _
 - b) Access to telephone, radio or other device for summoning emergency assistance. _ ☒ _ _
 - c) Portable fire control equipment. _ ☒ _ _
 - d) Water of adequate volume and pressure via (hoses) sprinkler, foamers or sprayers. _ ☒ _ _
3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (264.33) [3745-65-33] _ ☒ _ _
4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled. (264.34) [3745-65-34] _ ☒ _ _
5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained. (264.35) [3745-65-35] _ ☒ _ _
6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout. (264.37(a)) [3745-65-37(A)] _ ☒ _ _
7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented. (264.37(b)) [3745-65-37(B)] _ _ ☒ _

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

Subpart D: Contingency and Emergency

1. The facility has a written Contingency Plan designed to minimize hazards from fire, explosions or unplanned releases of hazardous wastes (264.51) [3745-65-52(A)(B)(C)(D)(E)] and contains the following components:
 - a) Actions to be taken by personnel in the event of an emergency incident. ☒
 - b) Arrangements or agreements with local or state emergency authorities. ☒
 - c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator. ☒
 - d) A list of all emergency equipment including location, physical description and outline of capabilities. ☒
 - e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel. (264.52(f)) [3745-65-52(F)] ☒
2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan. (264.53) [3745-65-53(A)(B)] ☒
3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan. (264.54) [3745-65-54] ☒
4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan. (264.55) [3745-65-55] ☒
5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 264.56(a-j). [3745-65-56(A-J)] ☒

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

Subpart E: Manifests/Records/Reporting

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

1. The operator maintains a written operating record at his facility as required by Section 264.73 [3745-65-73(A)] which contains the following information:
 - a) Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date(s) and method(s) pertinent to such treatment, storage or disposal. (264.73(b)(1)) [3745-65-73(B)(1)]
 - b) Common name, EPA Hazardous Waste Identification Number and physical state (liquid, solid, gas) of the waste(s).
 - c) The estimated (or actual) weight, volume or density of the waste material(s).
 - d) A description of the method(s) used to treat, store or dispose of the waste(s) using the EPA Handling Codes listed in 45 FR 33252 (May 19, 1980).
 - e) The present physical location of each hazardous waste within the facility.
 - f) FOR DISPOSAL FACILITIES, the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document number(s). (264.73(b)(2)) [3745-65-73(B)(2)]
 - g) Records of any waste analyses and trial tests required to be performed.
 - h) Records of the inspections required under Section 264.15 [3745.65.15] (General Inspection Requirements - Subpart B).
 - i) Records of any monitoring, testing or analytical data required under other Subparts as referenced by Section 264.73(b)(6). [3745-65-73(B)(6)]
 - j) Records of Closure cost estimates and Post-Closure (DISPOSAL ONLY) cost estimates required under Subpart G.

✓	—	—	—
✓	—	—	—
✓	—	—	—
✓	—	—	—
✓	—	—	—
—	—	✓	—
✓	—	—	—
✓	—	—	inspects daily for waste pile storage
—	—	✓	—
✓	—	—	—

RCRA INTERIM STATUS INSPECTION FORM

	Yes	No	N/A	Remark #
2. The operators has submitted an annual Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under Section 264.75. [3745-65-75]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.				
3. Manifests received by the facility are signed and dated; one copy is given to the transporter, one copy is sent to the generator within 30 days and one copy is kept for at least 3 years. (264.71) [3745-65-71(A)]	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
a) If shipping papers are used in lieu of manifests (bulk shipments, etc.) the same requirements are met. (264.71(b)) [3745-65-71(B)]	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
b) Any significant discrepancies in the manifest, as defined in Section 264.72(a) [3745-65-72(A)] are noted in writing on the manifest document. (264.71(a)(2)) [3745-65-71(A)(2)]	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
4. Any manifest discrepancies have been reconciled within 15 days as required by Section 264.72(b) or the operator has submitted the required information to the Regional Administrator/Director. [3745-65-72(B)]	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
5. If the facility has accepted any unmanifested hazardous wastes from off-site sources (except from small quantity generators) for treatment, storage, or disposal an unmanifested waste report containing all the information required by Section 264.76 has been submitted to the Regional Administrator/Director within 15 days. [3745-65-76(A)]	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

Subpart G: Closure and Post-Closure

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH DISPOSAL AND NON-DISPOSAL FACILITIES.

- | | | | | |
|--|-------------------------------------|--------------------------|-------------------------------------|--------------------------|
| 1. A written Closure Plan is on file at the facility and contains the following elements: (Section 264.112) [3745-66-12] | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| a) A description of how and when the facility will be closed. (264.112(a)(1)) [3745-66-12(A)(1)] | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) A description of how any of the applicable closure requirements in other Subparts of Section 264 [3745-66] (Tanks, Surface Impoundments, Landfill, etc.) will be carried out. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility. (NOTE: Maximum inventory should agree with the permit.) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d) A description of steps taken to decontaminate facility equipment. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| e) The year closure is expected to begin and a schedule for the various phases of closure. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 2. The Closure Plan has been amended within 60 days in response to any changes in facility design, processes or closure dates. (264.112(4)(B)) [3745-66-12(B)] | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 3. The Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning the Closure process. (264.112(4)(C)) [3745-66-12(C)] | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

Subpart II: Financial Requirements

1. The owner or operator of the facility has established financial assurance for closure by use of one of the following: (264.143) [3745-66-43]

a) A closure trust fund, or

Financial test

b) A surety bond, or

c) A closure letter of credit, or

d) A combination of financial mechanisms.

2. A written cost estimate for closure of the facility (as specified in the closure plan) is available. How much is it?

3. When was the most recent estimate made?

4. A written cost estimate for post closure care of the facility (if applicable) is available. How much is it?

5. When was the most recent estimate made?

REMARKS, GENERAL INTERIM STATUS REQUIREMENTS

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

Subpart L: Storage in Waste Piles

1. *A)* Waste materials which are subject to dispersal by wind have been adequately protected against such dispersal. [3745-67-51]

☒ ☐ ☐ ☐

B) The unit is designed and operated in conformance with 264.251.

2. If leachate or runoff from a Waste Pile is a hazardous waste, then one or more of the following steps have been taken to prevent or properly manage the situation: *(see permit page 12 of 15, item B).*

a) The pile has been placed on an impermeable base, run-on has been diverted away from the pile and any leachate or runoff is collected and managed as a hazardous waste.

☐ ☐ ☒ ☐

b) The pile has been protected from precipitation and run-on in a manner which prevents the generation of leachate and runoff.

☒ ☐ ☐ ☐

3. No new waste materials are added to an existing Waste Pile without first ascertaining that the material is compatible with the existing waste by conducting appropriate laboratory tests, which are documented in the facility operating record. [3745-67-52]

☒ ☐ ☐ ☐

4. Ignitable or Reactive waste materials are not placed in Waste Piles unless one or both of the following conditions are met: (264.256) [3745-67-56]

a) The addition to the pile results in a mixture which no longer meets the definition of Ignitable or Reactive under rules 3745-51-21 or 3745-51-23 and was done in compliance with the safety requirements of Section 264.17(b). [3745-65-17]

☐ ☐ ☒ ☐

b) The Ignitable or Reactive material is physically or otherwise protected from conditions which may cause ignition or reaction.

☐ ☐ ☒ ☐

RCRA INTERIM STATUS INSPECTION FORM

5. Incompatible materials, ignitable and reactive wastes are placed in the waste pile only in accordance with the safety requirements of Section 264.17(b) [3745-65-17]. (264.256 and 264.257(a)) [3745-67-56 and 3745-67-57(A)]
6. A waste stored in a pile and which is incompatible with materials stored nearby is separated or protected from them. (264.257(b)) [3745-67-57(B)]

<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
—	—	✓	—
✓	—	—	—

RCRA INTERIM STATUS INSPECTION FORM

Subparts D and P: Incineration and Thermal Treatment : *Burning Room*

1. Determination of Steady State

- a) type of unit (i.e., type of incinerator or thermal treatment): USEPA has permitted the burning room as an incinerator; Ohio EPA considers this a thermal treatment unit.
- b) Components and steady state condition:

NOTE: INDICATE WHETHER OR NOT THIS COMPONENT WAS AT STEADY STATE PRIOR TO ADDING WASTE. [3745-68-73]

<u>Component</u>	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. <u>Not Applicable. Steady state conditions</u>	—	—	✓	<u>#1</u>
<u>are not possible</u>	—	—	—	—
—	—	—	—	—
—	—	—	—	—

2. Waste Analysis

NOTE: THE FOLLOWING ARE MINIMUM REQUIREMENTS, FOR WASTES NOT PREVIOUSLY BURNED/TREATED:
40 CFR 264.341 [3745-68-75]

See remark #2

- | | | | | |
|---|---|---|---|---|
| a) Required analyses; has an analysis been performed for the heating value? | — | — | ✓ | — |
| b) Halogen content? | — | — | ✓ | — |
| c) Sulfur content? | — | — | ✓ | — |
| d) Has documented or written data been substituted for analysis of either: | | | | |
| 1. Lead? | — | — | ✓ | — |
| 2. Mercury? | — | — | ✓ | — |

RCRA INTERIM STATUS INSPECTION FORM

- g) List other parameters for which the waste is tested to enable owner or operator to establish steady state or determine the types of pollutants which may be emitted. (Note in Remarks any which you feel should be tested.)

	<u>Remark #</u>
1. <u>Steady state testing is not applicable</u>	_____
2. <u>All E.P. toxicity metals have been tested</u>	_____
X. _____	_____
X. _____	_____
X. _____	_____
X. _____	_____
X. _____	_____

3. Monitoring and Inspections (264.347) and [3745-68-77]

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
a) Are combustion/emission control instruments monitored at least every 15 minutes?	_____	_____	✓	#3
b) Is steady state maintained or corrections attempted?	_____	_____	✓	#4
c) Is stack plume observed at least hourly for normal color and opacity?	✓	_____	_____	_____
d) Did any stack observations made by owner or operator show a plume different than normal?	_____	✓	_____	_____
e) If yes to "d" above, were corrections made to return emissions to normal appearance?	_____	_____	✓	_____

NOTE: SPECIFY IN REMARKS FOR WHAT PERIOD OF TIME THIS WAS CHECKED.

RCRA INTERIM STATUS INSPECTION FORM

- | | <u>Yes</u> | <u>No</u> | <u>N/A</u> | <u>Remark #</u> |
|--|-------------------------------------|--------------------------|--------------------------|----------------------|
| f) Are the complete unit and associated equipment inspected daily for leaks, spills, and fugitive emissions? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="text"/> |
| g) Are emergency shutdown controls and system alarms checked daily for proper operation? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="text"/> |
| 4. <u>Open Burning</u> (265.382) [3745-68-82] <i>NOT APPLICABLE</i> | | | | |

NOTE: ONLY COMPLETE THIS PART IF THE FACILITY OPEN BURNS HAZARDOUS WASTE.

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|----------------------|
| a) Does this facility burn <u>only</u> waste explosives? (A <u>No</u> answer means <u>other</u> hazardous waste is open-burned.) | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="text"/> |
| b) If this facility open-burns waste explosives, does it burn the waste at a distance greater than or equal to the minimum specified distance (below). | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="text"/> |

Pounds of waste explosives
or propellants

Minimum distance from open
burning or detonation to
the property of others

0 to 100	204 m	670 ft.
101 to 1,000	380 m	1,250 ft.
1,001 to 10,000	530 m	1,730 ft.
10,001 to 30,000	690 m	2,260 ft.

REMARKS

RMI-Sodium Plant
Inspection of December 11, 1987

Burning Room

1. This unit operates as a non-continuous (batch) process which requires a complete thermal cycle to treat a discrete quantity of hazardous waste. See OAC 3745-68-73.
 2. Only one type of waste is treated in the thermal treatment unit. No new wastes are burned.
 3. There are no combustion/emission control instruments which can be monitored. The only monitoring device is a differential pressure gauge on the scrubber. This device does not monitor emissions, but can be used to determine if the scrubber is functioning as designed. It is equipped with a continuous monitor.
 4. There are no steady State conditions. The process consists of heating the containing vessel and wastes to initiate reaction. The reaction is self-sustaining and the reaction rate appears to be determined primarily by the amount of waste contained in the vessel which is being cleaned. However, the burning process can be influenced by adjusting the tilt of the containing vessel and the amount of air entering the combustion unit.
-

RMI - Sodium Plant

APP

RCRA LAND DISPOSAL RESTRICTION INSPECTION

APPLICABILITY CHECKLIST

Does the facility handle the following wastes?

		Gen.	Treat	Store	Disp.	Trans.
A.	<u>F-Solvent Wastes</u>					
1.	F001	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2.	F002	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3.	F003	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4.	F004	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.	F005	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

NO

Note: Use Appendix A to determine whether the facility is misclassifying any of its wastes.

B. California List Wastes

- Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains the following metals at concentrations greater than or equal to those specified

		Gen.	Treat	Store	Disp.	Trans.
{	Arsenic	500 mg/L	_____	_____	_____	_____
	Cadmium	100 mg/L	_____	_____	_____	_____
	Chromium VI	500 mg/L	_____	_____	_____	_____
	Lead	500 mg/L	_____	_____	_____	_____
	Mercury	20 mg/L	_____	_____	_____	_____
	Nickel	134 mg/L	_____	_____	_____	_____
	Selenium	100 mg/L	_____	_____	_____	_____
Thallium	130 mg/L	_____	_____	_____	_____	

RMI - Sodium Plant

U. S. EPA Permit Conditions Not Addressed in the Preceding
Compliance Inspection Form

	<u>Yes</u>	<u>No</u>	<u>Remarks</u>
1. The facility has completed the cost estimate for corrective action as specified on page 9 of 15, item O.			<u>Not applicable at this time</u> <u>A</u>
2. Financial assurance for corrective action has been provided as specified on page 10 of 15, item Q.			<u>Not applicable at this time</u> <u>A</u>
3. Wastes treated in the burning room contain no more than 150 ppm total barium and no more than 100 ppm of any other hazardous constituents listed in 40 CFR Part 261, Appendix VIII. See page 13 of 15, item B.1.			<u> </u> <u>A</u>
4. The incinerator waste feed is monitored as specified in Attachment II. See page 13 of 15, item B.2.	<u>✓</u>		
5. The RCRA Facility Investigation Plan has been submitted as specified on page 14 of 15, item B.1.	<u>✓</u>		<u>However, it was 3 wks. late</u>
A. The above plan contains the information required in item B.2. on page 14 of 15.	<u>UNKNOWN</u>		<u>B</u>
B. The facility has complied with item B.3. in lieu of item B.2. above. Which units?	<u>UNKNOWN</u>		<u>B</u>
6. RFI reports have been submitted as required on page 15 of 15, item B.4.		<u>✓</u>	<u>C</u>
7. Have additional solid waste management units been discovered? See page 15 of 15, item B.5.		<u>✓</u>	
8. The Regional Administrator has determined which solid waste management units require corrective action and has notified the facility. See page 15 of 15, item C.1.		<u>✓</u>	<u>B and C</u>
A. The facility has submitted a Corrective Measures Plan for each unit identified under item C.1. within 60 days of notification. See item C.2.		<u>✓</u>	<u>C</u>
B. The Corrective Measures Plan has been revised as requested by the Regional Administrator. See item C.3.		<u>✓</u>	<u>C</u>

- C. The Corrective Measures Plan has been implemented within 60 days of approval by the Regional Administrator as required in, item C.4.

____ ✓ ____ C

Remarks:

- A. The corrective action cost estimate can not be completed until the results of the incinerator waste feed sampling are available. Samples have been collected (October, 1987), but the results are not yet available.
- B. U.S. EPA currently is reviewing the RCRA Facility Investigation Plan, and is expected to comment on the adequacy of the plan in the near future.
- C. This phase of the corrective action process has not yet been reached.

RCRA INTERIM STATUS INSPECTION FORM

12/5/87

Facility Name: RMI - SODIUM PLANT
 Address: 600 STATE ROAD
ASHTABULA, OHIO 44004
 County: ASHTABULA

Date of Inspection 11/28/87
 HWFB #: 02-04-0554
 USEPA ID #: OH0 CCC-810-242
 Facility Phone #: (216) 997-5141

Facility Contact: MICHAEL MILLER
BEN DI RIENZO
 Inspector(s) Name(s): MARK BERGMAN

Facility Contact Phone #: (216) 544-7802
 Safety Equipment #: _____

STATUS

Cond. Ex. SQG _____ SQG _____ Generator X Transporter _____ Treatment X Storage _____ Disposal _____

ACTIVITIES

Containers _____ Tanks _____ Surface Impoundments _____ Incineration/Thermal treatment X
 Waste pile X Land treatment _____ Landfill _____ Groundwater monitoring _____
 Used oil burner _____ Hazardous waste fuel burner/blender _____

- | | <u>Y/N/NA</u> | <u>REMARK #</u> |
|---|---------------|-----------------|
| 1. Does the facility produce "discarded materials" as defined in 3745-51-02(A)? | <u>Y</u> | _____ |
| 2. Are they : | | |
| a. Abandoned(disposed;incinerated;accumulated, stored, or treated prior to disposal)? | <u>Y</u> | _____ |
| b. Recycled? | <u>Y</u> | _____ |
| c. Inherently waste-like?(F020,F021,F022,F023,F026,F028)? | <u>N</u> | _____ |
| 3. If recycled or accumulated, treated or stored before recycling, is the waste: | | |
| a. Used in a manner constituting disposal? | <u>N</u> | _____ |
| b. Burned for energy recovery? | <u>N</u> | _____ |
| c. Reclaimed? (Refer to Table 1 of 3745-51-02) | <u>Y</u> | _____ |
| d. Accumulated speculatively? | <u>N</u> | _____ |
| 4. Is the material recycled by being: | | |
| a. Used or reused as an ingredient in an industrial process to make a product without prior reclamation? | <u>N</u> | _____ |
| b. Used as an effective substitute for commercial products? | <u>N</u> | _____ |
| c. Returned to the original process from which it was generated without prior reclamation as a substitute for a raw material feedstock? | <u>Y</u> | _____ |

	<u>Y/N/NA</u>	<u>REMARK #</u>
Are Land Disposal Restricted (LDR) wastes generated? If so, complete appropriate LDR checklist.	<u>N</u>	16 DRUMS OF MONITOR WELL WASTES WERE LAND BAN FOR DISPOSAL
6. Has the facility submitted a Part A application to Ohio EPA in accordance with OAC 3745-50-40?	<u>Y</u>	_____
7. If yes, is it complete and accurate and does it contain all information specified in OAC 3745-50-41, -42, -43?	<u>Y</u>	_____
8. If not accurate, has a Permit Change Request (PCR) been submitted in accordance with 3745-50-51? If yes, what date was the PCR submitted.	<u>N/A</u>	_____
9. Is the facility operating in compliance with the terms and conditions of its HWFB permit?	<u>Y</u>	_____
10. Has the facility submitted a Part B?	<u>Y</u>	_____
11. Was advance notice of the inspection given? If so, how far in advance?	<u>Y</u>	<u>1 DAY</u>

REMARKS. GENERAL INFORMATION.

Include list of wastes being generated/managed at the site and a brief description of site activity and waste handling.

This facility manufactures elemental sodium and chlorine by electrolysis of salt (NaCl) in Downs Cells. Also produce industrial grade bleach and salt. Normally generate two hazardous waste streams; 1) Cell bath wastes from occasional overflows and periodic maintenance of the cells. This waste stream is EPA Toxic due to barium content and sometimes lead. These wastes are stored in a sheltered waste pile prior to off-site disposal at various TSD's; 2) Sodium/Calcium sludge builds up on the walls of receivers, containers, pipes and valves. This waste stream is hazardous because it is reactive. It is burned in an on-site thermal treatment unit and rendered non-hazardous. A one-time waste stream comes from two on-site monitor wells which have cuttings and samples with FCCZ. This waste appears to be from an off-site source. The sulfuric acid waste stream is neutralized and discharged under an NPDES permit. During monitor well sampling 1-5 and 2-5 water balings will be drummed as H.W.

3745-52 GENERATOR REQUIREMENTS (40 CFR Part 262)

		<u>Y/N/NA</u>	<u>REMARK #</u>
1.	Have the wastes generated at this facility been evaluated as required under 3745-52-11 (262.11)?	<u>Y</u>	
2.	Does this facility generate any hazardous wastes that are excluded from regulation under 3745-51-04 (261.4)?	<u>Y</u>	SODIUM FILTER SLUDGE
3.	Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment [3745-65-01] (265.1(c)(9)) or via operation of an elementary neutralization unit and/or wastewater treatment unit [3745-65-01] (265.1(c)(10))?	<u>Y</u>	SULFURIC ACID NEUTRALIZATION UNIT
4.	Is the generator classified as a Small Quantity Generator (SQG) or conditionally exempt SQG? If so, complete appropriate checklist.	<u>N</u>	
5.	Does the generator meet the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:		
a.	All hazardous wastes shipped off-site have been accompanied by a completed manifest using the most recently revised USEPA form 8700-22?	<u>Y</u>	
b.	The manifest form used contains all the information required by 3745-52-20 (262.20) and the minimum number of copies required by 3745-52-22 (262.22)?	<u>N</u>	NO SEQUENCE IN MANIFEST DOCUMENT SECTION
c.	The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with 3745-52-20(C)(D)(E) (262.20)?	<u>Y</u>	
d.	Prepared manifests have been signed by the generator and initial transporter in compliance with 3745-52-23(A)(1&2) (262.23)?	<u>Y</u>	
e.	The generator has complied with manifest exception reporting requirements in 3745-52-42 (262.42(a))?	<u>N/A</u>	
f.	Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by 3745-52-40 (262.40)?	<u>Y</u>	

6

Does the generator meet the following hazardous waste pre-transport requirements:

Y _____

- a. Prior to offering hazardous wastes for transport off-site, the waste material is packaged, labeled, and marked in accordance with applicable DOT regulations [3745-52-30, 3745-52-31, and 3745-52-32] (262.30, 262.31, 262.32)?
- b. Prior to offering hazardous waste for transport off-site, each container with a capacity of 110 gallons or less is affixed with a completed hazardous waste label as required by 3745-52-32 (262.32)?
- c. Prior to offering hazardous wastes for transport off-site, the generator meets requirements for properly placarding or offering to properly placard for the initial transporter of the waste material in compliance with 3745-52-33 (262.33)?

Y _____

Y _____

N/A _____

7.

Does the generator import or export hazardous waste?

N/A _____

If so, are the wastes handled in accordance with the requirements of 3745-52-50 (262.50)?

N/A _____

8.

If the generator elects to accumulate hazardous waste on-site in containers or tanks for 90 days or less without a hazardous waste facility installation and operation permit as provided under 3745-52-34 (262.34), are the following requirements with respect to such accumulation met:

- a. The containers or tanks are clearly marked with the words "Hazardous Waste"?
- b. The date that accumulation began is clearly marked on each container?
- c. If the waste is accumulated in containers, the generator is complying with OAC 3745-66-70 to 3745-66-77? Complete Management of Containers checklist.

N/A _____

N/A _____

N/A _____

- d. If the waste is accumulated in tanks, the generator is complying with OAC 3745-66-90, to 3745-66-992 except OAC 3745-66-97(C) and 3745-66-991? Complete Storage and Treatment in Tanks checklist. N/A
- e. If the generator accumulates waste at or near the point of generation which is under the control of the operator of the process generating the waste as allowed by 3745-52-34(C) are the following requirements met:
1. Quantities of waste accumulated do not exceed 55 gallons at any time? Y
 2. Quantities of acutely hazardous waste accumulated do not exceed 1 quart at any one time? N/A
 3. If the generator is accumulating hazardous waste in accordance with e.1 or e.2, above, has the generator marked the containers with words "Hazardous Waste" or with other words identify the contents of the container and is the generator complying with OAC 3745-66-71, 3745-66-72, 3745-66-73(A), 3745-66-76, and 3745-66-77? N
 4. If the generator accumulates hazardous wastes in excess of the amounts listed in either e.1 or e.2, above, did the generator comply with 3745-52-34(A) (262.34(a)) within three (3) days and mark the container holding the excess accumulation with the date the excess accumulation began accumulating? Y
9. Has the generator accumulated hazardous wastes in excess of ninety (90) days? N
10. Has the generator been granted an extension by the Director/Regional Administrator for accumulation in excess of ninety (90) days? N/A
11. Has the generator treated, stored, disposed of, transported or offered for transportation hazardous waste without having obtained a USEPA identification number from the Administrator as required under 3745-52-12 (262.12)? N

(F002)

MONITOR WELL
SITES 1-5
AND 2-5 BTL
WATER DRUMNEED TO
LABEL DRUM
AT 1-5 LOCATIONS

Y/N/NA REMARK #

- Does the generator provide a Personnel Training Program in compliance with 3745-65-16(A)(B)(C) (265.16) including instruction in safe equipment operation and emergency procedures, training new employees within 6 months and providing an annual training program refresher course? [3745-52-34(A)(4)] (262.34) Y _____
13. Does the generator keep all of the records required by 3745-65-16(D)(E) (265.16) including written job titles, job descriptions and documented employee training records? [3745-52-34(A)(4)] (262.34) Y _____
14. Has the generator filed annual reports on or before March 1st of the next calendar year as required by 3745-52-41? Y _____
15. Does the generator comply with the applicable requirements for owners or operators of hazardous waste facilities? Complete "Preparedness and Prevention" and "Contingency Plan and Emergency Procedures" checklists. Y _____

REMARKS, GENERATOR REQUIREMENTS

Y/N/NA REMARK #

1. Does the owner/operator (o/o) have a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by 3745-65-13(A)(1) (265.13(a))?

Y

2. Does o/o have a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste. [3745-65-13(B)] (265.13(b))

Y

3. a. Would physical contact with the waste structures or equipment injure unknowing/unauthorized person or livestock entering the facility? [3745-65-14(A)(1)] (265.14(a)(1))

b. Would disturbance of the waste cause a violation of the hazardous waste regulations? [3745-65-14(A)(2)] (265.14(a)(2))

N

Y

IF BOTH 3A AND 3B ARE NO, MARK QUESTIONS 4 AND 5 NOT APPLICABLE.

4. Does the facility have -

a. A 24-hour surveillance system, or

b. An artificial or natural barrier and a means to control entry at all times [3745-65-14(B)(2)(a and b)] (265.14(b)(2))

Y

Y

5. Does the facility have a sign "Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations as necessary. [3745-65-14(C)] (265.14(c))

Y

6. a. Has the o/o developed and followed a comprehensive, written inspection plan and documented the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. [3745-65-15] (265.15)

Y

- b. Are areas subject to spills (i.e., loading and unloading areas, etc.) inspection daily when in use and according to other applicable regulations when not in use. [3745-65-16(B)(4)] (265.15(b)(4))
7. Has the o/o provided a Personnel Training Program in compliance with 3745-65-16(A)(B)(C) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course? (265.16(a)(b)(c))
8. Does o/o keep all records required by 3745-65-16(D)(E) including written job titles, job descriptions and documented employee training records? (265.16(d)(e))
9. If Ignitable, Reactive or incompatible wastes are handled, does the facility meet the following requirements? [3745-65-17] (265.17)
- a. Protection from sources of ignition.
- b. Physical separation of incompatible waste materials.
- c. "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.
- d. Comingling of waste materials is done in a controlled, safe manner as prescribed by 3745-65-17(B) (265.17(b))

Y _____Y _____Y _____Y _____Y _____N/A _____
SODIUM CYANIDE
BE IGNITED
BY SMOKINGN/A _____

		<u>Y/N/NA</u>	<u>REMARK #</u>
1.	Is the facility operated to minimize the possibility of fire, explosion, or non-planned release of hazardous waste? [3745-65-31] (265.31)	<u>Y</u>	<u> </u>
2.	Has there been a fire, explosion or non-planned release of waste at the facility?	<u>N</u>	<u> </u>
a.	If yes, has the contingency plan been implemented?	<u>N/A</u>	<u> </u>
3.	If required due to actual hazards associated with the waste, does the facility have the following equipment: [3745-65-32(A)(B)(C)(D)] (265.32)		
a.	Internal alarm system?	<u>Y</u>	<u> </u>
b.	Access to telephone, radio or other device for summoning emergency assistance?	<u>Y</u>	<u> </u>
c.	Portable fire control equipment?	<u>Y</u>	<u> </u>
d.	Water of adequate volume and pressure via hoses, sprinkler, foamers or sprayers?	<u>Y</u>	<u> </u>
4.	Is all required spill control and decontamination equipment, fire and communications equipment tested and maintained as necessary? [3745-65-33] (265.33)	<u>Y</u>	<u> </u>
5.	If required due to the actual hazards associated with the waste, do personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled? [3745-65-34] (265.34)	<u>Y</u>	<u> </u>
6.	If required due to the actual hazards associated with the waste, is adequate aisle space to allow unobstructed movement of emergency or spill control equipment maintained? [3745-65-35] (265.35)	<u>N/A</u>	<u> </u>
7.	If required due to the actual hazards associated with the waste, has the facility attempted to make appropriate arrangements with local authorities to familiarize them with the possible hazards and the facility layout? [3745-65-37(A)] (265.37(a))	<u>Y</u>	<u> </u>

Y/N/NA REMARK #

Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements, has the refusal been documented. [3745-65-37(B)] (265.37(b))

N/A _____

Y/N/NA REMARK #

1. Does the o/o have a written Contingency Plan designed to minimize hazards from fire, explosions or unplanned releases of hazardous wastes which contains the following components for the facility? [3745-65-52(A)(B)(C)(D)(E)] (265.52):
 - a. Actions to be taken by personnel in the event of an emergency incident? Y
 - b. Arrangements or agreements with local or state emergency authorities? N ONLY HIGHWAY PATROL HAS WRITTEN AGREEMENT
 - c. Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator? Y
 - d. A list of all emergency equipment including location, physical description and outline of capabilities? Y
 - e. If required due to the actual hazards associated with the waste handled, an evacuation plan for facility personnel? [3745-65-52(F)] (265.52(f))? N/A
2. Is a copy of the Contingency Plan and any plan revisions maintained on-site and has it been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan? [3745-65-53(A)(B)] (265.53) Y
3. Is the plan revised in response to rule changes, facility, equipment and personnel changes or failure of the plan? [3745-65-54] (265.54) N PERSONNEL CHANGES
4. Is an emergency coordinator who is familiar with all aspects of site operation and emergency procedures who has the authority to implement all aspects of the Contingency Plan designated at all times (on-site or on-call)? [3745-65-56(A-J)] (265.56) Y
5. If an emergency situation has occurred, has the emergency coordinator implemented all or part of the Contingency Plan and taken all of the actions and made all of the notifications deemed necessary under 3745-65-56(A-J). (265.56(a-j)) N/A

OAC 3745-65 MANIFEST SYSTEM/RECORDS/REPORTING (40 CFR PART 265, SUBPART E)

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

Y/N/NA REMARK #

1. Does the o/o maintain a written operating record at the facility as required by 3745-65-73(A) (265.73) which contains the following information:
 - a. Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date and method pertinent to such treatment, storage or disposal? [3745-65-73(B)(1)] (265.73(b)(1)). Y _____
 - b. Common name, EPA Hazardous Waste Identification Number and physical state (solid, liquid, gas) of the waste? Y _____
 - c. The estimated (or actual) weight, volume or density of the waste material? Y _____
 - d. A description of the method(s) used to treat, store or dispose of the waste using the EPA handling codes listed in Table 2 of OAC 3745? (Part 265, Appendix I, Table 2) Y _____
 - e. The present physical location of each hazardous waste within the facility? Y _____
 - f. Records of incidents which require implementation of the Contingency Plan? N/A _____
 - g. FOR DISPOSAL FACILITIES, the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document numbers? [3745-65-73(B)(2)] (265.73(b)(2)) N/A _____
 - h. Records of any waste analyses and trial tests required to be performed? N/A _____
 - i. Records of the inspections required under 3745-65-15 (265.15) (General Inspection Requirements)? N/A _____
 - j. Records of any monitoring, testing, or analytical data required under other Subparts as referenced by 3745-65-73(B)(6); (265.73(b)(6))? N/A _____

		<u>Y/N/NA</u>	<u>REMARK #</u>
k.	Records of closure cost estimates and post-closure (DISPOSAL ONLY) cost estimates required under OAC 3745-66 (Part 265 Subpart G)?	<u>Y</u>	_____
2.	Has the o/o submitted an annual (biennial) Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under 3745-65-75 (265.75)?	<u>Y</u>	<u>2-23-87</u>
NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE ONLY TO OFF-SITE TSDS.			
3.	Are manifests received by the facility signed and dated? Is one copy given to the transporter, one copy sent to the generator within 30 days and one copy kept for at least 3 years? [3745-65-71(A)] (265.71)	<u>N/A</u> <u>N/A</u>	_____ _____
a.	If shipping papers are used in lieu of manifests (bulk shipments, etc.), are the same requirements met [3745-65-71(B)] (265.71(b))?	<u>N/A</u>	_____
b.	Are any significant discrepancies in the manifest, as defined in 3745-65-72(A) (265.72(a)) noted in writing on the manifest document.	<u>N/A</u>	_____
4.	Have any manifest discrepancies been reconciled within 15 days as required by 3745-65-72(B) (265.72(b)) or has the o/o submitted the required information to the Director/Regional Administrator?	<u>N/A</u>	_____
5.	If the facility has accepted any unmanifested hazardous wastes from off-site sources for treatment, storage, or disposal, has an unmanifested waste report containing all the information required by 3745-65-76(A) (265.76) been submitted to the Director/Regional Administrator within 15 days?	<u>N/A</u>	_____

		<u>Y/N/NA</u>	<u>REMARK #</u>
	Is a written closure plan on file at the facility which contains the following elements: [3745-66-12] (265.112)?	<u>Y</u>	_____
a.	A description of how each hazardous waste management unit will be closed in accordance with 265.111.	<u>Y</u>	_____
b.	A description of how final closure will meet the requirements of 3745-66-11 (265.111).	<u>Y</u>	_____
c.	An estimate of the maximum amount of hazardous waste ever in inventory.	<u>Y</u>	_____
d.	A description of steps taken to remove or decontaminate facility equipment containment systems, structures, soils, and all hazardous waste residues.	<u>Y</u>	_____
e.	The year closure is expected to begin and a schedule for the various phases of closure.	<u>Y</u>	_____
f.	A description of other activities necessary to ensure closure with the performance standards including ground water monitoring, leachate collection, and run-off control.	<u>N/A</u>	_____
2.	Has the closure plan (and post-closure plan, if applicable) been amended 60 days prior to any changes in facility design, processes, or closure dates or 60 days after an unexpected event occurs which affects the closure plan? [3745-66-12(C)] (265.112(C))	<u>N/A</u>	_____
3.	Has the closure plan (and post-closure plan, if applicable) for surface impoundment, waste pile, land treatment or landfill units been submitted to the Director/Regional Administrator 180 days prior to beginning the closure process? [3745-66-12(D)] (265.112(d))	<u>N/A</u>	_____
4.	Has the closure plan (and post-closure plan, if applicable) for tank, containers storage or incinerator units been submitted to the Director/Regional Administrator 45 days prior to beginning the closure process? [3745-66-12(D)] (265.112(d))	<u>N/A</u>	_____

Within 90 days of receipt of the final volume of waste or Director's plan approval, if that is later, was all hazardous waste treated, removed, or disposed in accordance with the approved plan? [3745-66-13(A)] (265.113(a))

N/A _____

6. Was closure completed in accordance with the approved plan within 180 days after receipt of final volume of waste or approval of the plan, if that is later? [3745-66-13(B)] (265.113(b))

N/A _____

7. Did the owner/operator submit to the Director/Regional Administrator, within sixty (60) days after completion of closure, certification by both the owner/operator and an independent registered professional engineer that the facility has been closed in accordance with the approved closure plan? [3745-66-15] (265.115)

N/A _____

8. Did the owner/operator submit to the local zoning authority and the Director/Regional Administrator a survey plan in accordance with OAC 3745-66-16?

N/A _____

9. What permitted units at the facility have been closed in accordance with an approved Closure Plan?

N/A _____

10. If closure was partial, list the regulated units which remain in use at the facility:

11. If required, has the facility prepared a written post-closure plan? [3745-66-18] (265.118)

N/A _____

12. Does the post-closure plan include:

- a. A description of proposed ground water monitoring?
b. A description of planned maintenance activities?
c. The name, address and phone number of person/office to contact during the post-closure period?

N/A _____

N/A _____

N/A _____

For disposal facilities, has the owner/operator submitted to local land authorities and the Director a survey plat within 60 days after certification of closure? [3745-66-19] (265.119) N/A _____

14. Has the owner of the property on which a disposal unit is located recorded on the deed that:

- a. The land has been used to manage hazardous waste and the type, quantity and location of waste? N/A _____
- b. Land use is restricted pursuant to 3745-66-17? [3745-66-19] (265.119) N/A _____

		<u>Y/N/A</u>	<u>REMARK #</u>
1.	Are hazardous wastes stored in containers which are:		
a.	Closed [3745-66-73(A)] (265.173)?	<u>Y</u>	<u> </u>
b.	In good condition [3745-66-71] (265.171)?	<u>Y</u>	<u> </u>
c.	Compatible with the wastes stored in them [3745-66-72] (265.172)?	<u>Y</u>	<u> </u>
2.	Are containers stored closed except when it is necessary to add or remove wastes? [3745-66-73(A)] (265.173(a))	<u>Y</u>	<u> </u>
3.	Are hazardous waste containers stored, handled and opened in a manner which prevents container rupture or leakage? [3745-66-73(B)] (265.173(b))	<u>Y</u>	<u> </u>
4.	Is the area where containers stored inspected for evidence of leaks or corrosion at least weekly? [3745-66-74] (265.174) [documentation of inspections required under 3745-65-15 for TSDs]	<u>N</u>	<u>SATELLITE DRUMS</u>
5.	Are containers holding ignitable or reactive waste located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] (265.176)	<u>N/A</u>	<u> </u>
6.	Are containers holding hazardous wastes stored separately from other materials which may interact with the waste in a hazardous manner? [3745-66-77(C)] (265.177(c))	<u>Y</u>	<u> </u>

Y/N/NA REMARK #

1. Waste materials which are subject to dispersal by wind have been adequately protected against such dispersal? [3745-67-51] (265.251) Y _____
2. If leachate or run-off from a Waste Pile is a hazardous waste, then following steps have been taken to prevent or properly manage the situation: [3745-67-53] (265.253)
- a. (1) The pile has been placed on an impermeable base that is compatible with the waste under conditions of treatment or storage; and Y _____
- (2) A run-on control system capable of handling a 24 hr, 25-yr storm has been implemented; and Y _____
- (3) A run-off management system capable of controlling a 24 hr, 25-yr storm has been implemented; and N/A _____
- (4) Facilities associated with run-on and run-off control systems are managed to maintain design capacity after a rain event; N/A _____
- or
- b. (1) The pile has been protected from precipitation and run-on in a manner which prevents the generation of leachate and runoff; and Y _____
- (2) No liquids or wastes containing free liquids are placed in the pile. Y _____
3. No new waste materials are added to an existing Waste Pile without first ascertaining that the material is compatible with the existing waste by conducting appropriate laboratory tests, which are documented in the facility operating record. [3745-67-52] (265.252) N/A _____

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NOTE: Approximately one wheelbarrow load of cell bath wastes were spilled over the waste pile wall onto a walkway. This must be cleaned up immediately when this occurs.

Are ignitable or reactive wastes not placed in waste piles unless one or both of the following conditions is met:
[3745-67-56] (265.256)

- a. The addition to the pile results in a mixture which no longer meets the definition of Ignitable or Reactive under rules 3745-51-21 or 3745-51-23 and was done in compliance with the safety requirements of 3745-65-17. (265.17(b)) N/A _____
- b. The Ignitable or Reactive material is physically or otherwise protected from conditions which may cause ignition or reaction. N/A _____

5. Are incompatible wastes, ignitable and reactive wastes placed in the waste pile only in accordance with the safety requirements of 3745-65-17? [3745-67-56 and 3745-67-57(A)] (265.256 and 265.257(a)) N/A _____

6. Is a waste stored in a pile which is incompatible with materials stored nearby, separated or protected from them? [3745-67-57(B)] (265.257(b)) N _____

7. At closure, have all waste residues and contaminated soils and structures been managed as hazardous waste? (Note: if all contaminated soils, structures, etc., cannot be removed, post-closure care as a landfill must be conducted) [3745-67-58] (265.258) N/A _____

		<u>Y/N/NA</u>	<u>REMARK #</u>
1.	Before adding hazardous waste, is the unit brought to steady state utilizing an auxiliary fuel? [3745-68-73 or 3745-68-45] (265.373 or 265.345)	<u>N/A</u>	BURN SOLID SODIUM WASTE W/ KEROSENE TORCH
a.	List type of fuel used <u>KEROSENE</u>		
b.	Is the process a batch thermal treatment process?	<u>Y</u>	
c.	Is the unit a boiler, industrial furnace, thermal treatment unit, or incinerator?		<u>THERMAL TREATMENT UNIT</u>
d.	Does the unit burn waste which is hazardous solely due to ignitability, reactivity, or combustibility?		<u>REACTIVITY</u>
2.	Waste Analysis. IN ADDITION TO ANALYSES REQUIRED UNDER 3745-65-13, THE FOLLOWING ARE MINIMUM REQUIREMENTS FOR WASTES NOT PREVIOUSLY BURNED/TREATED: [3745-68-41 and 3745-68-75] (265.341 and 265.375)		
a.	Heating value.	<u>N/A</u>	_____
b.	Halogen content.	<u>N/A</u>	_____
c.	Sulfur content.	<u>N/A</u>	_____
d.	Has documented or written data been substituted for analysis of either:		
	1. Lead?	<u>N/A</u>	_____
	2. Mercury?	<u>N/A</u>	_____
e.	List other parameters for which the waste is tested to enable the owner/operator to establish steady state or determine the types of pollutants which may be emitted. (Note in remarks any which you feel should be tested)		
<u>NO NEW WASTE STREAMS</u> <u>PLANNED.</u>			

RMI - Sodium Plant

U. S. EPA Permit Conditions Not Addressed in the Preceding Compliance Inspection Form

	<u>Yes</u>	<u>No</u>	<u>Remarks</u>
1. The facility has completed the cost estimate for corrective action as specified on page 9 of 15, item O.	<u> </u>	<u> </u>	RFI SUBMITTED IN MAY 1989 RMI AWAITING <u>N/A</u> COMMENTS FROM U.S.EPA
2. Financial assurance for corrective action has been provided as specified on page 10 of 15, item Q.	<u> </u>	<u> </u>	<u>N/A</u>
3. Wastes treated in the burning room contain no more than 150 ppm total barium and no more than 100 ppm of any other hazardous constituents listed in 40 CFR Part 261, Appendix VIII. See page 13 of 15, item B.1.	<u> X </u>	<u> </u>	DOCUMENTATION AVAILABLE ON-SITE
4. The incinerator waste feed is monitored as specified in Attachment II. See page 13 of 15, item B.2.	<u> X </u>	<u> </u>	<u> </u>
5. The RCRA Facility Investigation Plan has been submitted as specified on page 14 of 15, item B.1.	<u> X </u>	<u> </u>	<u>MAY 1989</u>
A. The above plan contains the information required in item B.2. on page 14 of 15.	<u> X </u>	<u> </u>	<u>3 SMU's</u>
B. The facility has complied with item B.3. in lieu of item B.2. above. Which units?	<u> X </u>	<u> </u>	1) CLOSED LANDFILL 2) BAKEN AREA 3) WWT POND
6. RFI reports have been submitted as required on page 15 of 15, item B.4.	<u> X </u>	<u> </u>	<u> </u>
7. Have additional solid waste management units been discovered? See page 15 of 15, item B.5.	<u> </u>	<u> X </u>	TWO AREAS REMOVED FROM SMU LIST
8. The Regional Administrator has determined which solid waste management units require corrective action and has notified the facility. See page 15 of 15, item C.1.	<u> </u>	<u> </u>	U.S. EPA AA: NOT COMPLET RFI REVIEW <u>N/A</u> YET
A. The facility has submitted a Corrective Measures Plan for each unit identified under item C.1. within 60 days of notification. See item C.2.	<u> </u>	<u> </u>	<u>N/A</u>
B. The Corrective Measures Plan has been revised as requested by the Regional Administrator. See item C.3.	<u> </u>	<u> </u>	<u>N/A</u>